

EXHIBIT 3
Redactions Approved by
Court Order (ECF 220)

- STUART VARDAMAN -

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X
ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 17, 2020

TIME: 9:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF STUART VARDAMAN, held via Zoom, pursuant to ^

Notice, before Hope Menaker, a Shorthand Reporter

and Notary Public of the State of New York.

<p style="text-align: right;">Page 42</p> <p>1 - STUART VARDAMAN -</p> <p>2 her background was?</p> <p>3 A. Not that I recall. I think it was</p> <p>4 known that she had an industry background.</p> <p>5 Q. What did you know about her industry</p> <p>6 background?</p> <p>7 A. I think that she was at JPM. Yeah,</p> <p>8 that's pretty much it.</p> <p>9 Q. That's pretty much all you knew about</p> <p>10 her background?</p> <p>11 A. Correct.</p> <p>12 Q. Do you know what role she had at</p> <p>13 JPM?</p> <p>14 A. No, not that I recall.</p> <p>15 Q. Do you know how many years she had in</p> <p>16 the financial services industry?</p> <p>17 A. Not -- no, not that I recall.</p> <p>18 Q. Do you know what her technological</p> <p>19 background was, her technology background?</p> <p>20 A. No.</p> <p>21 Q. Do you know what advanced degrees she</p> <p>22 had?</p> <p>23 A. I don't recall --</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. -- ma'am.</p>	<p style="text-align: right;">Page 44</p> <p>1 - STUART VARDAMAN -</p> <p>2 conversation early on where I highlighted the</p> <p>3 process and that we were putting her in process</p> <p>4 and I'm -- I'm -- over the course of that</p> <p>5 conversation, yeah, we may have spent some time on</p> <p>6 her background.</p> <p>7 Q. Are you referring to a conversation</p> <p>8 you had with Ms. Rowe?</p> <p>9 A. Yeah.</p> <p>10 Q. When was that conversation?</p> <p>11 A. Oh, goodness. It would have been</p> <p>12 after Tariq asked our team to put her in process</p> <p>13 for the head of financial services.</p> <p>14 Q. Please tell me everything you recall</p> <p>15 about that conversation.</p> <p>16 A. Given she was a Googler, I wanted to</p> <p>17 share with her the process that we were running</p> <p>18 and we spent some time talking about her</p> <p>19 background as a means to spend a few minutes,</p> <p>20 quote/unquote, getting to know each other.</p> <p>21 Q. What did you discuss about her</p> <p>22 background?</p> <p>23 A. I don't recall. It was quite some</p> <p>24 time ago.</p> <p>25 Q. How long did that conversation last?</p>
<p style="text-align: right;">Page 43</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. Did you know --</p> <p>3 A. I was asked to put her in process and</p> <p>4 I did.</p> <p>5 Q. Okay. I'm asking: At any point in</p> <p>6 time, did you learn what her qualifications were?</p> <p>7 A. No.</p> <p>8 Q. At any point in time, did you learn</p> <p>9 what her industry background was beyond the fact</p> <p>10 that she worked at JPM?</p> <p>11 A. At any point in time?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. At any point in time, did you learn</p> <p>15 what her management background was managing teams?</p> <p>16 A. No.</p> <p>17 Q. At any point in time, did you learn</p> <p>18 what advanced degrees she had?</p> <p>19 A. You already asked that question.</p> <p>20 Q. I'm asking now at any point in time.</p> <p>21 A. No, I didn't spend time on it.</p> <p>22 Q. At any point in time, did you do</p> <p>23 anything to educate yourself about her</p> <p>24 qualifications for the role?</p> <p>25 A. Ma'am, you know, we may have had -- a</p>	<p style="text-align: right;">Page 45</p> <p>1 - STUART VARDAMAN -</p> <p>2 A. I -- I can't say for sure.</p> <p>3 Q. Was it more than five minutes?</p> <p>4 A. I'm sorry, did you say more than five</p> <p>5 minutes?</p> <p>6 Q. Yes.</p> <p>7 A. Yes, for -- for sure.</p> <p>8 Q. Was it more than fifteen minutes?</p> <p>9 A. If I think about conversations like</p> <p>10 that it probably would have clocked in at about</p> <p>11 forty-five minutes, but again I can't state for</p> <p>12 sure.</p> <p>13 Q. At any point in time, did you review</p> <p>14 Ms. Rowe's resume?</p> <p>15 A. I don't remember.</p> <p>16 Q. At any point in time, did you review</p> <p>17 Ms. Rowe's LinkedIn profile?</p> <p>18 A. I'm sure I would have come across it,</p> <p>19 yeah.</p> <p>20 Q. Do you recall whether you reviewed</p> <p>21 it?</p> <p>22 A. Reviewing and looking at it, yeah,</p> <p>23 probably.</p> <p>24 Q. I'm asking if you have an independent</p> <p>25 recollection of actually viewing it or just you</p>

<p style="text-align: right;">Page 46</p> <p>1 - STUART VARDAMAN -</p> <p>2 are assuming you would have.</p> <p>3 A. I'm assuming that I would have.</p> <p>4 Q. Do you recall anything else with</p> <p>5 respect to the conversation you had with Mr.</p> <p>6 Shaukat regarding her entering the process?</p> <p>7 A. The conversations specifically, no.</p> <p>8 Again, he asked to include her in the process and</p> <p>9 we made that happen.</p> <p>10 Q. Did you understand her to have raised</p> <p>11 her hand to be considered for the position?</p> <p>12 A. I don't recall --</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I don't recall if she had applied.</p> <p>15 Q. Do you recall being interviewed by</p> <p>16 employee relations in connection with Ms. Rowe?</p> <p>17 A. Whether or not I knew on the outset</p> <p>18 it had to do with Ulku I can't say for sure, but I</p> <p>19 think the content of that conversation centered</p> <p>20 there or as a topic. So, yeah, I do recall</p> <p>21 speaking with employee relations.</p> <p>22 Q. Did you actually get interviewed on</p> <p>23 two occasions by employee relations?</p> <p>24 A. It's possible.</p> <p>25 Q. Do you recall telling employee</p>	<p style="text-align: right;">Page 48</p> <p>1 - STUART VARDAMAN -</p> <p>2 asked us to put her in process.</p> <p>3 Q. Were you surprised that Mr. Shaukat</p> <p>4 was considering someone at a Level 8?</p> <p>5 A. That was my assumption on her level.</p> <p>6 My job is not to be surprised. When my hiring</p> <p>7 manager asks me to involve a Googler in the</p> <p>8 process, I do that.</p> <p>9 Q. Did Mr. Shaukat share with you that</p> <p>10 she was wasn't senior enough for the role, but he</p> <p>11 still wanted you to put her in the process anyway?</p> <p>12 A. Not that I recall.</p> <p>13 MS. GREENE: We have been going about</p> <p>14 an hour, does anyone need a short break?</p> <p>15 Let's take a five-minute break and</p> <p>16 we'll come back and continue on. Our -- our</p> <p>17 videographer will take it off the record.</p> <p>18 MR. GAGE: Okay.</p> <p>19 THE VIDEOGRAPHER: Going off the</p> <p>20 record, the time is 10:41 a.m. New York time.</p> <p>21 (Whereupon, a brief discussion was</p> <p>22 held off record.)</p> <p>23 THE VIDEOGRAPHER: The time is 10:49</p> <p>24 a.m. New York time, we're back on the record.</p> <p>25 Q. Okay. Mr. Vardaman, I would like you</p>
<p style="text-align: right;">Page 47</p> <p>1 - STUART VARDAMAN -</p> <p>2 relation -- employee relations that she may have</p> <p>3 bubbled it up, the position, herself to Tariq?</p> <p>4 A. I don't recall saying that exactly.</p> <p>5 Q. Whether you said that exactly, in sum</p> <p>6 or substance do you recall saying to ER that she</p> <p>7 might have been the one to raise her hand for that</p> <p>8 position?</p> <p>9 A. I -- I really can't say. I don't</p> <p>10 remember the exact context and all the content of</p> <p>11 that discussion.</p> <p>12 Q. Do you recall, putting aside that</p> <p>13 discussion, whether at any point in time you</p> <p>14 learned that Ms. Rowe had raised her hand to be</p> <p>15 considered for the position?</p> <p>16 A. I -- I'm sorry, I'm having trouble</p> <p>17 remembering the detail that you want.</p> <p>18 Q. Do you recall whether you had</p> <p>19 conversations with Ms. Rowe about whether she was</p> <p>20 the one to throw her hat into the ring, so to</p> <p>21 speak?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No. As I mentioned -- sorry, my</p> <p>24 screen keeps blanking out. As I mentioned, I</p> <p>25 connected with her. I believe it was after Tariq</p>	<p style="text-align: right;">Page 49</p> <p>1 - STUART VARDAMAN -</p> <p>2 to look back at the Box again and you may need to</p> <p>3 refresh.</p> <p>4 A. Okay.</p> <p>5 Q. And we're looking for a document that</p> <p>6 was previously marked as Exhibit 51. Tell me when</p> <p>7 you have that open.</p> <p>8 A. Forgive me. I'm not trying to be</p> <p>9 dense here. What you do you mean previously</p> <p>10 marked as 51? Can you share the whole title.</p> <p>11 Q. It says "Exhibit 51" in the Box.</p> <p>12 A. Okay. Well, I have two 51s in there.</p> <p>13 MR. GAGE: And this one says</p> <p>14 X0051Bern version.</p> <p>15 A. Okay, okay. Okay, I got it.</p> <p>16 MR. GAGE: That just simply means it</p> <p>17 was marked as an exhibit during a prior</p> <p>18 deposition.</p> <p>19 THE WITNESS: Ah. Okay, got it.</p> <p>20 Q. Do you have that document open?</p> <p>21 A. I do.</p> <p>22 Q. Okay. The document you're looking at</p> <p>23 was previously marked as Exhibit 51, Bates stamped</p> <p>24 GOOG-ROWE-00056990 through 014. So if you look at</p> <p>25 this document, in the upper right-hand corner are</p>

<p style="text-align: right;">Page 66</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 A. I do.</p> <p>2 Q. Does that refresh your recollection</p> <p>3 about whether Mr. Stevens was supportive of her</p> <p>4 interviewing for the role?</p> <p>5 A. Honestly, that would have been a</p> <p>6 conclusion that I reached given -- given Eryka's</p> <p>7 e-mail, the previous exhibit.</p> <p>8 Q. At any point in time, did anyone tell</p> <p>9 you that Mr. Stevens was not supportive of her for</p> <p>10 the role?</p> <p>11 A. No.</p> <p>12 Q. Did you discuss that with Mr.</p> <p>13 Shaukat?</p> <p>14 A. Discuss what?</p> <p>15 MR. GAGE: Objection.</p> <p>16 Q. Whether Mr. Stevens was supportive of</p> <p>17 her for the role.</p> <p>18 A. No, that would have been a</p> <p>19 conversation between VPs.</p> <p>20 If, you know, I can shed a little bit</p> <p>21 more light about my intent in these, messages like</p> <p>22 these for candidates both in Goog -- in internal</p> <p>23 and external, it's a -- it's an attempt to help</p> <p>24 the candidates put their best foot forward so that</p> <p>25</p>	<p style="text-align: right;">Page 68</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 had -- had stepped back from the panel interviews</p> <p>2 and -- and so we ultimately landed at the</p> <p>3 panelists that were -- that are listed in -- in</p> <p>4 GHire, I guess.</p> <p>5 Q. Looking again at Exhibit 106 under</p> <p>6 "Impression," the bullet "Impression."</p> <p>7 You write "Executive poise confident,</p> <p>8 but not ego driven, forthright with a quick</p> <p>9 operating cadence." Do you see that?</p> <p>10 A. Yes, I do.</p> <p>11 Q. What was that impression based on?</p> <p>12 A. That would have been my meeting with</p> <p>13 her, the -- the one that I had mentioned was</p> <p>14 probably around 45 minutes. Again, this is my</p> <p>15 attempt in my job to help ensure that candidates</p> <p>16 are -- are putting their best foot forward with</p> <p>17 the information that -- that I tee up panel</p> <p>18 members for. I -- yeah.</p> <p>19 Q. You've only been giving accurate</p> <p>20 information as part of these e-mails, correct?</p> <p>21 A. Yes, for the benefit of the</p> <p>22 candidate. I can tell you that my personal</p> <p>23 impression in my conversation was -- was that I</p> <p>24 was talked down to that I felt as -- as a result</p> <p>25</p>
<p style="text-align: right;">Page 67</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 a panel member could read some of this and say</p> <p>2 okay, I am -- I am interested in meeting this</p> <p>3 candidate and -- and so there -- there's some</p> <p>4 content in there to -- to help, in this case, Ulku</p> <p>5 put her best foot forward.</p> <p>6 Q. Who made the decision about who Mr.</p> <p>7 Rowe's interview panel would be?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. That would have been a conversation</p> <p>10 likely during one of our meetings between Tariq</p> <p>11 and Fiona O'Donnell at the time. It would have</p> <p>12 been a -- Tariq's business partner -- HR business</p> <p>13 partner, excuse me, and me.</p> <p>14 And, if -- if I can, the -- the</p> <p>15 reason that that's a discussion is because we want</p> <p>16 panel members, A, to be objective, but then, B,</p> <p>17 representative of relationships that a given</p> <p>18 candidate might be expected to work with closely</p> <p>19 for the benefit of our -- of our customers.</p> <p>20 Q. What did you discuss with respect to</p> <p>21 who would be the panel members for Ms. Rowe's</p> <p>22 interview?</p> <p>23 A. I don't recall specifics. As -- as I</p> <p>24 had mentioned in an earlier exhibit, Brian</p> <p>25</p>	<p style="text-align: right;">Page 69</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 of my level.</p> <p>2 Q. What made you feel like you were</p> <p>3 talked down to?</p> <p>4 A. There was a perceptible, perceivable</p> <p>5 annoyance I think with the -- the conversation</p> <p>6 that -- that she had with me.</p> <p>7 Q. And tell me about that.</p> <p>8 A. I felt dismissed at the end of the</p> <p>9 day as a result of my conversation with -- with</p> <p>10 Ulku.</p> <p>11 Q. What did she say that made you feel</p> <p>12 dismissed?</p> <p>13 A. I don't recall specifics.</p> <p>14 Q. What made you say -- what did she say</p> <p>15 that made you perceive that she was annoyed?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. It would have been a combination of</p> <p>18 her -- I -- I think of her demeanor and her -- her</p> <p>19 word choice in that meeting with me, but again the</p> <p>20 specifics I -- I don't recall exactly.</p> <p>21 Q. What about her demeanor?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Again, the conclusion I felt as a</p> <p>24 result of interacting with her was that I felt</p> <p>25</p>

<p style="text-align: right;">Page 70</p> <p>1 - STUART VARDAMAN -</p> <p>2 dismissed and -- and talked down to I -- I guess</p> <p>3 by the fact I was having and requesting a meeting</p> <p>4 with her to -- to shed light on the process.</p> <p>5 I think it's important to note that</p> <p>6 none of that came out here in this note to Jason</p> <p>7 in advance of the interview prep, hence going back</p> <p>8 to what I said earlier about ensuring that the</p> <p>9 candidates are being presented the best possible</p> <p>10 light.</p> <p>11 Q. I understand how you felt leaving</p> <p>12 that meeting. Now I want you to explain to me</p> <p>13 what she did or what she said that led you to feel</p> <p>14 that way.</p> <p>15 MR. GAGE: Objection. Asked and</p> <p>16 answered.</p> <p>17 A. Again I -- I can't recall the</p> <p>18 specifics, ma'am. There is an aspect of being</p> <p>19 successful at Google, which is this notion of</p> <p>20 Googleness, and part of that is encapsulated</p> <p>21 with openly and actively working across the</p> <p>22 organization regardless of level, sometimes L 2s.</p> <p>23 And, again, my impression/feeling after my</p> <p>24 conversation with Ulku was that I was dismissed</p> <p>25 and be -- because of level.</p>	<p style="text-align: right;">Page 72</p> <p>1 - STUART VARDAMAN -</p> <p>2 no, ma'am. I mean, we're -- we're getting back to</p> <p>3 2018 here and -- and I'm -- you know, I -- I just</p> <p>4 -- just don't -- don't recall the specifics.</p> <p>5 Q. Do you recall whether she was unhappy</p> <p>6 with the process as opposed to being unhappy with</p> <p>7 you?</p> <p>8 A. No. I -- I don't recall the -- any</p> <p>9 -- any difference there. If I were in her shoes,</p> <p>10 I would have been excited to run the process.</p> <p>11 Q. Did Mr. Shaukat interview her for the</p> <p>12 role?</p> <p>13 A. It depends on what you mean by</p> <p>14 "interview." I don't -- I don't know if there's a</p> <p>15 specific meeting document in GHire.</p> <p>16 Q. Do you know if at any point in time</p> <p>17 he met with her to discuss her qualifications for</p> <p>18 the role?</p> <p>19 A. No, ma'am, I don't have insight into</p> <p>20 that meeting.</p> <p>21 Q. Do you know if that meeting ever took</p> <p>22 place?</p> <p>23 A. No, ma'am, I really don't.</p> <p>24 Q. Would -- you described for me as a --</p> <p>25 as a point in the process that Mr. Shaukat would</p>
<p style="text-align: right;">Page 71</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. What was the last thing, because of</p> <p>3 what?</p> <p>4 A. Because of my level, being an L 6 and</p> <p>5 being involved in this process as -- as</p> <p>6 essentially the facilitator of -- of the process</p> <p>7 we were running.</p> <p>8 Q. Did she know your level?</p> <p>9 A. I don't know.</p> <p>10 Q. Did you do anything to document your</p> <p>11 impressions leaving that meeting?</p> <p>12 A. I don't think so, no.</p> <p>13 Q. Did you share those impressions with</p> <p>14 anyone?</p> <p>15 A. No, it's not my job.</p> <p>16 Q. In that meeting, did Ms. Rowe express</p> <p>17 any frustration that she had not been contacted</p> <p>18 before about the position?</p> <p>19 A. Not that I recall, no, ma'am.</p> <p>20 Q. Do you recall her again noting</p> <p>21 that -- or alluding to your recruiting process</p> <p>22 when she joined and that she thought OCTO group</p> <p>23 was a holding place until verticalization?</p> <p>24 A. Verticalization, this stuff on the</p> <p>25 last couple of docu -- or couple of exhibits ago,</p>	<p style="text-align: right;">Page 73</p> <p>1 - STUART VARDAMAN -</p> <p>2 meet with candidates. Do you know whether he did</p> <p>3 that with Ms. Rowe?</p> <p>4 A. I don't. What I was describing there</p> <p>5 was largely for external candidates.</p> <p>6 Q. Did Mr. Shaukat ever share feedback</p> <p>7 with respect to his view of her qualifications for</p> <p>8 the role?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. His view -- I'm sorry?</p> <p>11 Q. Did Mr. Shaukat --</p> <p>12 A. His view on who? I'm sorry.</p> <p>13 Q. I'll re-ask the question. Did Mr.</p> <p>14 Shaukat ever share with you his view of Ms. Rowe's</p> <p>15 qualifications for her consideration for the --</p> <p>16 the head of financial services role?</p> <p>17 A. No, ma'am.</p> <p>18 Q. Did you ever ask him for</p> <p>19 documentation related to his view of her</p> <p>20 qualifications for that role?</p> <p>21 A. No, ma'am. Again, he -- he asked me</p> <p>22 to involve her in the process and because she's a</p> <p>23 Googler, that's -- largely how the process</p> <p>24 manifested for Ulku is exactly what we would have</p> <p>25 done for -- for a Googler whom Tariq wanted to</p>

<p style="text-align: right;">Page 98</p> <p>1 - STUART VARDAMAN -</p> <p>2 (The question and answer requested</p> <p>3 was read back by the reporter.)</p> <p>4 MR. GAGE: Yeah, I thought there was</p> <p>5 more to his answer because I got bits and</p> <p>6 pieces of kind of a clipped response on the</p> <p>7 video as it froze.</p> <p>8 Q. So let me ask the question again --</p> <p>9 A. Okay.</p> <p>10 Q. -- and we can go through. Who made</p> <p>11 the decision that she was not viable for the role?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. What I captured there is not a</p> <p>14 decision and that must have been referencing the</p> <p>15 information I'd received from Darryl and Jason.</p> <p>16 Q. So this was your -- this was</p> <p>17 reflecting your impression based on what you heard</p> <p>18 from Darryl and Jason?</p> <p>19 A. Yeah, most likely.</p> <p>20 Q. And what you heard from them came in</p> <p>21 the form of a ping; is that right?</p> <p>22 A. That is correct.</p> <p>23 Q. Okay. We're going to go down again.</p> <p>24 Give me a minute, I might be able to tell what you</p> <p>25 page.</p>	<p style="text-align: right;">Page 100</p> <p>1 - STUART VARDAMAN -</p> <p>2 looks like he had some questions on her ability to</p> <p>3 spur followership.</p> <p>4 Q. Did he share anything more with you?</p> <p>5 A. No, ma'am, not that I recall.</p> <p>6 Q. Okay. We're going to go down again</p> <p>7 to Page 117, the page Bates stamped 838 and you</p> <p>8 see this is August 10th, 2018?</p> <p>9 A. Yes.</p> <p>10 Q. And --</p> <p>11 MR. GAGE: I'm sorry, 8 -- 830 what?</p> <p>12 MS. GREENE: 838. 8-3-8.</p> <p>13 MR. GAGE: Oh, okay. I thought you</p> <p>14 said 113.</p> <p>15 MS. GREENE: 117 is the PDF number.</p> <p>16 MR. GAGE: All right.</p> <p>17 Q. And if you turn to the next page and</p> <p>18 look at the entry for Ms. Rowe, "This is awaiting</p> <p>19 complete feedback. Met with Sebastian, 8/2.</p> <p>20 Darryl, Jason, Vats, 8/8. Vats liked her. Darryl</p> <p>21 liked her. Had some questions followership." Do</p> <p>22 you see that?</p> <p>23 A. I do.</p> <p>24 Q. So this is approximately two days</p> <p>25 after those -- the interview completed, correct?</p>
<p style="text-align: right;">Page 99</p> <p>1 - STUART VARDAMAN -</p> <p>2 Okay. We're going to Page 104 in the</p> <p>3 PDF which is Bates Page 825 and you might need to</p> <p>4 look to the prior page to see the date, this is</p> <p>5 August 24th, 2018. Do you see that?</p> <p>6 A. I do.</p> <p>7 Q. Okay. Then going down to the entry</p> <p>8 for Ulku Rowe it says "Chasing feedback" and does</p> <p>9 that indicate as of August 24th you were still</p> <p>10 chasing feedback?</p> <p>11 A. In the system, yes.</p> <p>12 Q. It says "Met with Sebastian 8/2,</p> <p>13 Darryl, Jason, Vats 8/8. Vats liked her. Darryl</p> <p>14 liked her. Had some questions followership." Do</p> <p>15 you see that?</p> <p>16 A. I do.</p> <p>17 Q. Does this reflect what had been</p> <p>18 communicated to you by Vats and Darryl?</p> <p>19 A. Yeah, must have. Yeah, because I</p> <p>20 wrote it.</p> <p>21 Q. Do you recall Darryl saying he liked</p> <p>22 her?</p> <p>23 A. I don't, but I think as a -- as a</p> <p>24 matter of practice I would have captured the</p> <p>25 sentiment and it -- and, as you can see here, it</p>	<p style="text-align: right;">Page 101</p> <p>1 - STUART VARDAMAN -</p> <p>2 A. 8/8 and this is 8/10, yes.</p> <p>3 Q. So between 8/10 -- well, at any point</p> <p>4 after 8/10, did you receive any other feedback</p> <p>5 with respect to Ms. Rowe?</p> <p>6 A. I -- I really don't remember. It's a</p> <p>7 flurry of activities to get people to enter their</p> <p>8 feedback into GHire.</p> <p>9 Q. If you had received additional --</p> <p>10 well, let me ask you this. With respect to the</p> <p>11 feedback that you did receive from Mr. Willis, is</p> <p>12 it reflected here in this entry?</p> <p>13 A. Yeah, I think so.</p> <p>14 Q. Is there any reason why you did not</p> <p>15 include feedback that you had received from Mr.</p> <p>16 Martin in this entry?</p> <p>17 A. I may not have been able to get any.</p> <p>18 Q. And so your understanding was that at</p> <p>19 least two of the people that she interviewed with</p> <p>20 liked her, correct?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. From their perspective, that</p> <p>23 was what I had received. If I translated it here,</p> <p>24 there's considerable nuance beneath that which is</p> <p>25 why I was orienting people toward the entering</p>

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2 (Whereupon, Exhibit 111 was marked at

3 this time.)

4 Q. Do you recognize this as a

5 communication from yourself dated 12 November,

6 2018?

7 A. I do.

8 Q. And who is Dave Beuerlein?

9 A. Dave Beuerlein was the leader, the

10 director of the organization I mentioned earlier

11 that I was a part of, the kind of broader LST

12 group that worked across the various product

13 areas.

14 Q. Do you see where it says "VP

15 Financial Services"?

16 A. Yes, I do.

17 Q. Is that referring to the head of

18 financial services role?

19 A. I think so, yes.

20 Q. And it says "Two finalists: [REDACTED]

21 [REDACTED] and [REDACTED] external.

22 Both candidates have completed all stages in the

23 process. [REDACTED] met Diane Greene on 10/11 and we

24 have been in a holding pattern since then. The

25 next step would be to choose the candidate and

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2 begin the packet process." Do you see that?

3 A. I do.

4 Q. As of November 12th then, had it been

5 determined that the two finalists for the position

6 were [REDACTED] and [REDACTED]?

7 A. No, honestly that looks like an

8 oversight on my part.

9 Q. That you did not know?

10 A. Correct, and Dave -- or in my email

11 to Dave, I reference the -- the ping

12 conversation. I'm not sure what the context of

13 that -- or I don't recall what the context of that

14 ping conversation was.

15 Q. But here you don't make any mention

16 of Ms. Rowe as a finalist for the position,

17 correct?

18 A. That is correct.

19 Q. At any point in time was a

20 determination made, that you know of, that Ms.

21 Rowe was not a candidate anymore for the position?

22 A. No.

23 MR. GAGE: Objection.

24 A. Again, the -- the search concluded

25 being canceled with no candidate being selected.

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2 Q. So is it your testimony that she was

3 not rejected for the role?

4 MR. GAGE: Objection.

5 A. As I recall, Tariq was going to

6 circle back with her and let her know where things

7 landed with Thomas Kurian joining and -- and

8 ultimately the cancelation.

9 Q. So, again, is it your testimony that

10 she was not suggested for the role, that the role

11 closed before there had been a determination with

12 respect to Ms. Rowe; is that your testimony?

13 A. Correct --

14 MR. GAGE: Objection.

15 A. -- the role closed.

16 Q. Did Mr. Shaukat tell you that he had

17 received a communication from Ms. Rowe saying that

18 she thought she was more qualified than the two

19 finalists?

20 A. No.

21 Q. Did Mr. Shaukat tell you that she had

22 told him that she thought he should just give her

23 the role?

24 A. No, I don't recall that.

25 Q. Did Mr. Shaukat tell you that she had

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2 raised a concern about discrimination?

3 A. No, ma'am.

4 Q. Did he tell you that she had raised a

5 concern about her levelling?

6 A. No.

7 Q. Did he tell you that she had raised

8 a concern that her initial leveling was

9 under-leveled and that was impacting her

10 consideration for the VP position?

11 A. For the lead financial services

12 position, no, not that I recall. Tariq typically

13 didn't share such -- such things, even if he would

14 have insight into them.

15 Q. Did Mr. Shaukat tell you that ER was

16 looking into concerns that Ms. Rowe had raised?

17 A. Not that I recall, no.

18 Q. Did Mr. Shaukat tell you that he was

19 concerned that she might leave Google?

20 A. Not that I recall, no.

21 Q. Did you form your own opinion about

22 Ms. Rowe as a candidate for the VP of financial

23 services position?

24 MR. GAGE: Objection.

25 A. My opinion, given she was a Googler,